

### REMARKS

In response to the final Office Action of May 15, 2007, Applicants ask that all pending claims presently under consideration be allowed in view of the following remarks. Claims 1-11, 14, 15, 19-24, and 28-55 are pending, of which claims 1, 14, 20, 21, and 44 are independent.

#### Rejection of Claims 44-48

Claims 44-48 were rejected as being unpatentable over Bertram (U.S. Patent No. 5,818,446) in view of Alexa ("Alexa Internet and Netscape Team to Provide Related Sites To Support Smart Browsing") and Furst (U.S. Patent No. 6,297,819). Applicants respectfully submit that neither Bertram, Alexa, Furst, nor any proper combination of the references, describes or properly suggests all of the features of claim 44-48, as described below.

#### Claim 44

Independent claim 44 recites, *inter alia*, presenting on a chrome portion of a browser display, in addition to at least some of an initial set of selectable chrome elements, an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed and removing or changing the additional and new selectable chrome element in response to detected navigation to a second web resource, as recited in claim 44. Applicants respectfully submit that neither Bertram, Alexa, Furst, nor any proper combination of the references, describes or properly suggests these features.

The Office Action appears to rely on a combination of Alexa and Furst in rejecting these features of independent claim 44. See Office Action of May 15, 2007 at page 27. Applicants respectfully disagree.

In particular, Alexa describes providing a targeted list of links to sites related to a website currently being rendered by a web browser. See Alexa at page 1, lines 5-18. In one aspect, Alexa describes that advertisements may be added to a toolbar displayed by the Alexa system. See Alexa at page 3, lines 20-25. Adding an advertisement to the Alexa toolbar, however, does not describe or suggest presenting on a chrome portion of a browser display, in addition to at least some of an initial set of selectable chrome elements, an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed.

First, the advertisement is merely a promotional message about a company sponsoring the advertisement. The Office Action argues that Alexa teaches adding an "advertising button" to a toolbar. See Office Action of May 15, 2007 at page 27 and 29. However, the cited portion of Alexa, or any other portion of Alexa, does not describe that the advertisement added to the toolbar is an "advertising button." Rather, Alexa describes that an "ad" is added to the Alexa toolbar, but provides no description or suggestion that the "ad" is selectable or has any type of functionality. See Alexa at page page 3, lines 20-25. Therefore, Alexa fails to describe or suggest presenting an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed.

Second, the advertisement described in Alexa is not presented on a chrome portion of a browser display. Instead, the advertisement is displayed in the Alexa toolbar, which is provided in a separate window that works with and accompanies the browser. See Alexa at page 10 ("The Alexa Service appears on your desktop in its own window"). As shown in the figure illustrated on page 10 of Alexa, the Alexa toolbar is displayed a separate window from the browser display and, therefore, is not part of the chrome portion of the browser display. See id. As such, when the Alexa system adds an advertisement to the Alexa toolbar, nothing is added to the chrome portion of the browser display and the chrome portion of the browser display remains unchanged.

Therefore, Alexa fails to describe or suggest presenting on a chrome portion of a browser display, in addition to at least some of an initial set of selectable chrome elements, an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed and removing or changing the additional and new selectable chrome element in response to detected navigation to a second web resource, as recited in claim 44.

Furst describes an application delivery system that allows a user to select and enable component applications whose functionality becomes available to the user through a client program running on the user's computer system. See Furst at col. 2, lines 18-30. The application delivery system is premised on a client program that is separate from the web browser operating on the user's computer. See Furst at Fig. 1 (showing user's computer 120 having a web browser program 122 and a system client 124, where the tool bar 114 of Furst's application delivery system is separate from the web browser window 112) and col. 4, lines 16-

21. As a consequence, Furst does not present on a chrome portion of a browser display an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed, as recited by claim 44. Rather, as shown in Figs. 1 and 5, Furst describes displaying user interface elements or icons representing system and component application tools separate from the browser display. See Furst at col. 4, lines 25-37 and col. 8, lines 39-46. Therefore, Furst fails to describe or suggest presenting on a chrome portion of a browser display, in addition to at least some of an initial set of selectable chrome elements, an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed and removing or changing the additional and new selectable chrome element in response to detected navigation to a second web resource, as recited in claim 44.

Furthermore, no proper combination of Alexa and Furst describes or suggests these features. Specifically, even assuming, *arguendo*, that one would be motivated to combine Alexa with Furst and replace the advertisement added to the Alexa toolbar with a component application tool described in Furst, the combination would not describe or suggest presenting an additional and new selectable chrome element on a chrome portion of a browser display. As discussed above, the Alexa toolbar is displayed a separate window from the browser display and, therefore, is not part of the chrome portion of the browser display. Accordingly, adding a component application tool described in Furst to the Alexa toolbar does not describe or suggest presenting an additional and new selectable chrome element on a chrome portion of a browser display.

Moreover, even assuming, *arguendo*, that a component application tool described in Furst is an element that is related to functionality offered by a first web resource being accessed, no motivation exists for replacing the advertisement displayed in Alexa with an icon representing a component application tool. As discussed above, the advertisement is not a control element configured to invoke functionality and, therefore, a person of ordinary skill in the art would not be motivated to replace the advertisement with such a control element.

Accordingly, for at least the reasons described above, Applicants submit that neither Alexa, Furst, nor any proper combination of the two, describes or suggests presenting on a chrome portion of a browser display, in addition to at least some of an initial set of selectable

chrome elements, an additional and new selectable chrome element that is related to functionality offered by a first web resource being accessed and removing or changing the additional and new selectable chrome element in response to detected navigation to a second web resource, as recited in claim 44.

Bertram does not remedy the deficiencies of Alexa and Furst. Specifically, the Office Action indicates that Bertram does not explicitly disclose "the functionality offered by the web resource being accessed." See Office Action of May 15, 2007 at page 27.

Therefore, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 44.

#### Claims 45-48

With regard to dependent claims 45-48, Applicants request reconsideration and withdrawal of the rejections of claims 45-48 at least for the reason of their dependency on claim 44. In addition, neither Bertram, Alexa, Furst, nor any proper combination of the references, describes or suggests the additional subject matter recited in dependent claims 45-48, as described more fully below.

For example, dependent claim 45 recites that the additional selectable chrome element is defined by the web resource being accessed. Neither Bertram, Alexa, Furst, nor any proper combination of the references, describes or suggests this feature.

The Office Action relies on Furst for this feature. See Office Action of May 15, 2007 at page 28. However, none of the identified portions, or any other portions, of Furst describe or suggest that the additional selectable chrome element is defined by the web resource being accessed by navigation of the web browsing application, as recited in dependent claim 45.

Rather, as shown in Fig. 2 of Furst, the web browser 122 communicates with an actual web site 210 to navigate to and render a display of the actual web site. See Furst at col. 5, lines 41-49. In parallel and separate from navigation to the actual website 210, a client program 124 running on a user's computer communicates with a service server 220 and a component application (tool) server 230 to generate parallel web pages or component application tools. See Furst at col. 6, line 51-col. 7, line 15. As such, the actual web site 210 being accessed by the web browser 122 has no part in defining the parallel web pages or component application tools. Instead, a separate client program and separate servers define the parallel web pages or

component application tools. Therefore, Furst fails to describe or suggest that the additional selectable chrome element is defined by the web resource being accessed by navigation of the web browsing application, as recited in dependent claim 45.

For at least this additional reason, Applicants respectfully request reconsideration and withdrawal of the rejection of dependent claim 45.

In addition, dependent claim 46 recites that appearance of the additional selectable chrome element is defined by the web resource being accessed, dependent claim 47 recites that functionality invoked upon selection of the additional selectable chrome element is defined by the web resource being accessed, and dependent claim 48 recites that the additional selectable chrome element is provided by the web resource being accessed.

As discussed with respect to claim 45, Furst fails to describe or suggest that the additional selectable chrome element is defined by the web resource being accessed by navigation of the web browsing application. Therefore, Furst also fails to describe or suggest that appearance of the additional selectable chrome element is defined by the web resource being accessed, as recited in claim 46, and functionality invoked upon selection of the additional selectable chrome element is defined by the web resource being accessed, as recited in claim 47.

Moreover, as discussed with respect to claim 45, Furst describes that a separate client program and separate servers provide the parallel web pages or component application tools. Thus, Furst fails to describe or suggest that the additional selectable chrome element is provided by the web resource being accessed, as recited in claim 48.

Accordingly, for at least these additional reasons, Applicants respectfully request reconsideration and withdrawal of the rejections of dependent claims 45-48.

#### **Rejection of Claims 14, 19, and 32-35**

Claims 14, 19, and 32-35 were rejected as being unpatentable over Bertram in view of Hoyle (U.S. Patent No. 6,141,010), Alexa, and Furst. Applicants respectfully submit that neither Bertram, Hoyle, Alexa, Furst, nor any proper combination of the references, describes or properly suggests all of the features of claims 14, 19, and 32-35, as described below.

**Claims 14 and 19**

Independent claim 14 is directed to a web browser that, *inter alia*, includes a chrome display program that is configured to receive modified chrome specifiers that cause the chrome display program to return chrome, from chrome including an added control element, to a default chrome. Applicants respectfully submit that neither Bertram, Hoyle, Alexa, Furst, nor any proper combination of the references, describes or properly suggests this feature.

The Office Action concedes that "Bertram does not explicitly teach the chrome returns to a default chrome when the chrome specifier is not associated with the current web site" and relies on Hoyle for this feature. See Office Action of May 15, 2007 at page 17. In particular, the Office Action cites Hoyle at col. 9, lines 42-52 and 62-67, and col. 10, lines 11-13 and argues that a "default browser is used to display the specific web page," "default browser becomes a customized browser by add or remove icon onto or off the tool bar of the default browser," and "a default browser is returned when the user access to another link." See id. Applicants respectfully disagree with the Office Action's characterization of the identified portions of Hoyle and submit that Hoyle fails to describe or suggest returning chrome, from chrome including an added control element, to a default chrome.

Specifically, the identified portions of Hoyle describe that when "a user has entered a web page" a program "initiates operation of the user's default browser and directs it to access and display the specified web page." See Hoyle at col. 9, lines 49-52. In another portion, Hoyle describes that the "program is operable to respond to the user's selection of any one of the links by accessing the selected web page using the default browser." See Hoyle at col. 10, lines 11-13. In referring to "default browser," Hoyle is not making reference to the chrome that is displayed on the browser display, but rather referring to the default program on the user's computer that is used to access web pages. For example, if the default browser on the user's computer is "Internet Explorer," the computer accesses web pages using Internet Explorer. In another example, if the default browser on the user's computer is "Netscape Navigator," the computer accesses web pages using Netscape Navigator. As such, by describing that a default browser is used to access web pages, Hoyle describes that a particular browser program is selected from among possible browser programs (e.g., Internet Explorer and Netscape Navigator) for use in accessing web pages without regard for the chrome being displayed by the default browser

program. Thus, the identified portions of Hoyle do not describe or suggest returning chrome, from chrome including an added control element, to a default chrome.

Neither Alexa nor Furst remedy the failure of Hoyle to describe or suggest returning chrome, from chrome including an added control element, to a default chrome. Nor does the Office Action contend that Alexa or Furst does so.

Accordingly, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 14 and claim 19 depending therefrom.

**Claims 32-35**

With regard to dependent claims 32-35, Applicants request reconsideration and withdrawal of the rejections of claims 32-35 at least for the reason of their dependency on claim 14. In addition, neither Bertram, Hoyle, Alexa, Furst, nor any proper combination of the references, describes or suggests the additional subject matter recited in dependent claims 32-35, as described more fully below.

Claims 32-35, although different in scope from claims 45-48, recite features similar to those recited by claims 45-48, respectively. Similar to the rejection of claims 45-48, the Office Action relies on Furst for teaching the features recited in claims 32-35. See Office Action of May 15, 2007 at page 19. Therefore, for at least the additional reasons discussed above with respect to claims 45-48, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 32-35.

**Rejection of Claims 1-11, 15, 20-24, 28-31, 36-43, and 49-55**

**Claim 1, 9, 20, and 21**

Claims 1, 9, 20, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bertram in view of Hoyle. Applicants respectfully submit that neither Bertram, Hoyle, nor any proper combination of the two, describes or properly suggests all of the features of independent claims 1, 20, and 21.

For example, independent claim 1 is directed to a web browser that includes, *inter alia*, a chrome display program configured to receive chrome specifiers associated with the current web site, where the chrome specifiers cause the chrome display program to add a new control element to the chrome being displayed on a chrome portion of a browser display while maintaining at

least one element of the chrome that was displayed prior to the addition of the new control element. The new control element is configured to invoke functionality related to the current web site being displayed.

Applicants request reconsideration and withdrawal of the rejection of claim 1 because neither Bertram, Hoyle, nor any proper combination of the two, describes or suggests at least these features of independent claim 1.

Specifically, in Bertram, parallel chromes or toolbars are used to accommodate users of differing sophistication. In columns 5 and 6, Bertram describes the utility of parallel chromes in various contexts that service users of different sophistication, such as shopping mall kiosks and browser-equipped terminals at the home or throughout an office. See, e.g., Bertram at col. 5, line 59 to col. 6, line 21. For instance, the user interface that the system of Bertram provides for a child includes a simplified version of a chrome, whereas the user interface provided for a parent is a correspondingly more complex version of chrome. Compare Bertram Fig. 2 at item 3 (showing a simplified children's version of chrome having four controls depicted as a Capitol building, a car, a printer, and a house, respectively) with Bertram Fig. 3 at item 3 (showing an adult version of chrome having nine controls, each control depicted as graphical icon and text).

By adjusting the complexity of the chrome, Bertram contemplates modifying the appearance of the chrome and changing the control elements displayed in the chrome. More particularly, only pictures are included in the chrome of the child toolbar of Figure 2 while words are included in the chrome of the adult toolbar of Figure 3. The adult toolbar of Figure 3 includes more control elements than displayed in the child toolbar of Figure 2. Referencing the above-mentioned examples, Bertram explicitly describes various control elements that would be added or removed from a chrome, as follows:

- (1) an address bar is included in the adult toolbar, but not the child's toolbar;
- (2) the adult toolbar includes the ability to invoke multiple concurrent browser instances;
- (3) more complex and numerous choices are offered to adults.

See Bertram at col. 5, lines 33-45 and col. 5, line 55 to col. 6, line 21.

These examples illustrate that Bertram modifies the user interface with control elements that are appropriate for the sophistication and requirements of the accessing user. In doing so,



the functionality of the control elements are not related to the current website being displayed, but rather provide generic functionality that is independent of the current website being displayed. Notably, the Office Action refers to the control elements "home" and "print" as control elements configured to invoke functionality related to the current website being displayed. See Office Action of May 15, 2007 at page 3. However, the functionality of "home" and "print" control elements is the same regardless of the website being displayed and, therefore, not related to the current website being displayed. Thus, Bertram fails to describe or suggest a chrome display program configured to receive chrome specifiers associated with the current web site, where the chrome specifiers cause the chrome display program to add a new control element that is configured to invoke functionality related to the current web site being displayed to the chrome being displayed on the chrome portion of the browser display while maintaining at least one control element of the chrome that was displayed prior to the addition of the new control element, as recited by independent claim 1.

Applicants submit that Hoyle does not remedy Bertram's failure to describe or suggest these features. Nor does the Office Action contend that Hoyle does so.

Therefore, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 1 and claim 9 depending therefrom.

Regarding the rejection of independent claim 20 as being unpatentable over Bertram in view of Hoyle, Applicants respectfully submit that neither Bertram, Hoyle, nor any proper combination of the two, describes or properly suggests all of the features of independent claim 20.

In particular, independent claim 20 is directed to a web browser program that, *inter alia*, includes a chrome display program configured to receive chrome specifiers associated with the current web site, wherein the chrome specifiers cause the chrome display program to modify less than all of the control elements on the chrome being displayed on the chrome portion of the browser display and at least one modified control element is configured to invoke functionality related to the current web site being displayed. As described above, Bertram, Hoyle, alone or in the proposed combination, do not describe or suggest a chrome display program configured to receive chrome specifiers associated with the current web site, where the chrome specifiers cause the chrome display program to add a new control element that is configured to invoke

functionality related to the current web site being displayed to the chrome being displayed on the chrome portion of the browser display. Therefore, Bertram, Hoyle, alone or in the proposed combination, also do not describe or suggest a chrome display program configured to receive chrome specifiers associated with the current web site, where the chrome specifiers cause the chrome display program to modify less than all of the control elements on the chrome being displayed on the chrome portion of the browser display and at least one modified control element is configured to invoke functionality related to the current web site being displayed, as recited in independent claim 20.

Therefore, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 20.

Regarding the rejection of independent claim 21 as being unpatentable over Bertram in view of Hoyle, Applicants respectfully submit that neither Bertram, Hoyle, nor any proper combination of the two, describes or properly suggests all of the features of independent claim 21.

For example, independent claim 21 is directed to a method for reconfiguring chrome of a user interface to a web browser program and recites, inter alia, adding a new control element to the chrome being displayed on the chrome portion of the browser display while maintaining at least one element of the chrome that was displayed prior to the addition of the new control element. As described above, Bertram, Hoyle, alone or in the proposed combination, do not describe or suggest a chrome display program configured to receive chrome specifiers associated with the current web site, where the chrome specifiers cause the chrome display program to add a new control element that is configured to invoke functionality related to the current web site being displayed to the chrome being displayed on the chrome portion of the browser display while maintaining at least one control element of the chrome that was displayed prior to the addition of the new control element. Therefore, Bertram, Hoyle, alone or in the proposed combination, also do not describe or suggest adding a new control element that is configured to invoke functionality related to the current web site being displayed to the chrome being displayed on the chrome portion of the browser display while maintaining at least one control element of the chrome that was displayed prior to the addition of the new control element, as required by independent claim 21.

Therefore, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 21.

**Claims 3, 8, 10, 11, 22-24, and 55**

Claims 3, 8, 10, 11, 22-24, and 55, which each depend directly or indirectly from claims 1 or 21, have been rejected as being unpatentable over Bertram in view of Hoyle and Alexa. Alexa does not remedy the failure of Bertram and Hoyle to describe or suggest the subject matter of claims 1 and 21. Therefore, for at least the reasons discussed above with respect to claims 1 and 21, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 3, 8, 10, 11, 22-24, and 55.

**Claims 28-31, 36-43, and 49-54**

Claims 28-31, 36-43, and 49-54, which each depend directly or indirectly from claims 1, 20, or 21, have been rejected as being unpatentable over Bertram in view of Hoyle and Furst. Furst does not remedy the failure of Bertram and Hoyle to describe or suggest the subject matter of claims 1, 20, and 21. Therefore, for at least the reasons discussed above with respect to claims 1, 20, and 21, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 28-31, 36-43, and 49-54.

In addition, claims 28-31, which depend from claim 1, claims 36-39, which depend from claim 20, and claims 40-43, which depend from claim 21, although different in scope from claims 45-48, each recite features similar to those recited by claims 45-48, respectively. Similar to the rejection of claims 45-48, the Office Action relies on Furst for teaching the features recited in claims 28-31 and 36-43. Therefore, for at least the additional reasons discussed above with respect to claims 45-48, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 28-31 and 36-43.

**Claims 2, 4-7, and 15**

Claims 2, 4-7, and 15, which each depend directly or indirectly from claim 1, have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Bertram in view of Hoyle, Alexa, and Furst in further view of one of Miller ("An Introduction to the Resource Description Framework," D-Lib Magazine, May 1998, pages 1-12), Peyer (U.S. Patent No. 6,188,401), Brown ("Using Netscape 2" published by Que Corporation 1995, page 74), and Alexa 2 ("Ad on

the Bar Campaign Supplements Alexa's Focused Advertising Program,"

[http://www.alexa.com/press/press\\_releases/ad.html](http://www.alexa.com/press/press_releases/ad.html), pages 1-3, published 12/10/1997).

None of Miller, Peyer, Brown, or Alexa 2 remedy the failure of Alexa, Hoyle, Bertram, and Furst, alone or in combination, to describe or suggest the subject matter of claim 1. Therefore, neither Bertram, Hoyle, Alexa, Furst, Miller, Peyer, Brown, Alexa 2, nor any combination of the references, describe or suggest the subject matter of claim 1.

For at least the reasons discussed above with respect to claim 1, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 2, 4-7, and 15, which depend directly or indirectly from claim 1.

### Conclusion

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant : David HYATT et al.  
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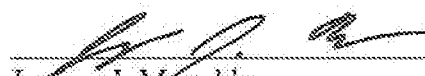
Attorney's Docket No.: 06975-188001 / Browser 05

Applicants submit that all claims are in condition for allowance.

No fees are believed to be due. Please apply any charges or credits to deposit account 061050.

Respectfully submitted,

Date: 7/16/07

  
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